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5 Attorneys for Defendant
 6 WELLS FARGO BANK, N.A.,
 7 successor by merger with Wells Fargo
 8 Bank Southwest, N.A., f/k/a Wachovia
 Mortgage, FSB, f/k/a World Savings
 Bank, FSB ("Wells Fargo")

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

11
 12 ROSE R. RAMIREZ, an individual

13 Plaintiff,

14 v.

15 WELLS FARGO BANK, N.A.; and
 16 Does 1 through 50, Inclusive,

17 Defendants.

CASE NO.: 2:17-cv-02688-PSG-AFM

**STIPULATION TO EXTEND TIME
 TO RESPOND TO COMPLAINT BY
 NOT MORE THAN 30 DAYS
 (L.R. 8.3)**

Removal Effected: Apr. 7, 2017
 Current Response Date: Apr. 14, 2017
 New Response Date: May 12, 2017

*[Assigned to the Hon. Philip S.
 Gutierrez]*

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 21
 22 **TO THE HONORABLE COURT:**

23 Plaintiff ROSE R. RAMIREZ and defendant WELLS FARGO BANK,
 24 N.A., successor by merger with Wells Fargo Bank Southwest, N.A., f/k/a
 25 Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB ("Wells Fargo")
 26 through their respective counsel of record, hereby stipulate pursuant to Local Rule
 27 8.3 to extend the date for Wells Fargo to respond to plaintiff's Complaint to and
 28 including **May 12, 2017**, a date which is not more than thirty (30) days from the

1 date a response initially would have been due.

2 This continuance is also requested for the parties to continue to explore
3 settlement.

4 **IT IS SO STIPULATED.**

5 *Pursuant to L.R. 5-4.3.4, I, Jeremy E. Shulman, attest that all other*
6 *signatories listed below, and on whose behalf the filing is submitted, concur in the*
7 *content of this filing and have authorized the filing. /s/ Jeremy E. Shulman.*

8
9 Respectfully submitted,

10 Dated: April 13, 2017

LAW OFFICES OF RANDOLPH ROGER
RAMIREZ, PC

11
12
13 By: /s/ Randolph Roger Ramirez
14 Randolph Roger Ramirez
Attorneys for Plaintiff
ROSE R. RAMIREZ

15
16 Respectfully submitted,

17 Dated: April 13, 2017

18 ANGLIN, FLEWELLING, RASMUSSEN,
19 CAMPBELL & TRYTTEN LLP

20 By: /s/ Jeremy E. Shulman
21 Jeremy E. Shulman
jshulman@afrc.com
22 Attorneys for Defendant
23 WELLS FARGO BANK, N.A., successor
24 by merger with Wells Fargo Bank
Southwest, N.A., f/k/a Wachovia Mortgage,
25 FSB, f/k/a World Savings Bank, FSB
26 (“Wells Fargo”)
27
28

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare that I am over the age of 18 and am not a party to
 3 this action. I am employed in the City of Pasadena, California; my business
 4 address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 301 N. Lake
 Ave, Suite 1100 Pasadena, CA 91101-4158

5 On the date below, I served a copy of the foregoing document entitled:

6 **STIPULATION TO EXTEND TIME TO RESPOND TO**
 7 **COMPLAINT BY NOT MORE THAN 30 DAYS**

8 on the interested parties in said case as follows:

9 **Served Electronically Via the Court's**
CM/ECF System

10
 11 *Attorneys for Plaintiff*
Rose R. Ramirez

12 Randolph Roger Ramirez, Esq.
 13 LAW OFFICES OF RANDOLPH ROGER RAMIREZ, PC
 14 1613 Chelsea Road, Suite 186
 San Marino, CA 91108

15 Email: rrr@4lawrrr.com

16 Tel: 626.765.5411 | Fax: 626.784.0480

17 I declare under penalty of perjury under the laws of the United States of
 18 America that the foregoing is true and correct. I declare that I am employed in
 19 the office of a member of the Bar of this Court, at whose direction the service
 was made. This declaration is executed in Pasadena, California on April 14,
 20 2017.

21 Lina Velasquez

(Type or Print Name)

/s/ Lina Velasquez

(Signature of Declarant)

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP